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Attorney for Defendant, HOWARD REDMOND

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RICHARD W. WIEKING
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

E-Filing

UNITED STATES DISTRICT COURT
IN AND FOR THE NORTHERN DISTRICT OF CALIFORNIA

DAVID CHAD GLOW,

Plaintiff,

v.

UNION PACIFIC RAILROAD
COMPANY, HOWARD REDMOND, an
individual, and does 1 through 20,
inclusive,

Defendants.

CASE NO.: C 05 01933 MMC

STIPULATION MODIFYING
PRETRIAL PREPARATION ORDER;
ORDER THEREON

AND RELATED COUNTER-CLAIM

COME NOW David Chad Glow, Plaintiff/Counter-defendant, Union Pacific Railroad Company, Defendant/Counter-defendant, and Howard Redmond, Defendant/Counter-claimant, who hereby enter into the following stipulation:

IT IS HEREBY STIPULATED THAT:

1. Non-expert discovery will be completed on or before **July 5, 2006**.
2. Expert disclosures are due on or before **July 14, 2006**. The parties hereby waive the Federal Court Rule 26 provision requiring reports be completed and exchanged at the time of disclosure and/or supplemental disclosure.
3. Supplemental expert disclosures are due on or before **July 24, 2006**.

4. Expert witness discovery will be completed on or before **August 15, 2006**.
5. Dispositive hearing motions will be filed no later than **July 15, 2006**.
6. All other dates shall remain unchanged, Further Status Conference, **June 30, 2006**,
Pre-trial Conference, **September 14, 2006**, and Trial, **September 25, 2006**.

At this time, the parties do not anticipate requesting any other changes to the Pretrial Preparation Order. The parties further agree that counter-part facsimile renditions of signatures are sufficient for entry of this stipulation into the court files.

IT IS SO STIPULATED.

Dated: May 16, 2006

LAW OFFICES OF JEAN SCHAEFER

By: Jean Schaefer
Jean Schaefer
Attorney for Defendant/Counterclaimant

Dated: May _____, 2006

UNION PACIFIC RAILROAD COMPANY

By: _____
Michael L. Whitcomb
John D. Feeney
Attorneys for Defendant/Counterdefendant

Dated: May _____, 2006

GANONG & WYATT

By: _____
Phillip W. Ganong
Ralph Wm. Wyatt
Attorneys for Plaintiff/Counterdefendant

ORDER

After considering the Stipulation by and between the parties, through their counsel of record,
IT IS HEREBY ORDERED THAT:

1. Non-expert discovery will be completed on or before July 5, 2006.
2. Expert disclosures are due on or before July 14, 2006. No reports shall be exchanged
and filed at the time at the time of disclosure and/or supplemental disclosure.
3. Supplemental expert disclosures are due on or before July 24, 2006.
4. Expert witness discovery will be completed on or before August 15, 2006.


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1 5. Dispositive hearing motions will be filed no later than July 15, 2006.

2
3 All other dates shall remain unchanged, Further Status Conference, June 30, 2006, Pre-trial
4 Conference, September 14, 2006, and Trial, September 25, 2006.

5 **JUN 12 2006**

6 DATED: _____

7
8 
9 MAXINE M. CHESNEY
 U. S. DISTRICT JUDGE

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JEAN SCHAEFER

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4. Expert witness discovery will be completed on or before August 15, 2006.
5. Dispositive hearing motions will be filed no later than July 15, 2006.
6. All other dates shall remain unchanged, Further Status Conference, June 30, 2006, Pre-trial Conference, September 14, 2006, and Trial, September 25, 2006.

At this time, the parties do not anticipate requesting any other changes to the Pretrial Preparation Order. The parties further agree that counter-part facsimile renditions of signatures are sufficient for entry of this stipulation into the court files.

IT IS SO STIPULATED.

Dated: May 16, 2006

LAW OFFICES OF JEAN SCHAEFER

By: Jean Schaefer
Jean Schaefer
Attorney for Defendant/Counterclaimant

Dated: May __, 2006

UNION PACIFIC RAILROAD COMPANY

By: Michael L. Whitcomb
Michael L. Whitcomb
John D. Feeney
Attorneys for Defendant/Counterdefendant

Dated: May 27, 2006

GANONG & WYATT

By: Phillip W. Ganong
Phillip W. Ganong
Ralph Wm. Wyatt
Attorneys for Plaintiff/Counterdefendant

ORDER

After considering the Stipulation by and between the parties, through their counsel of record, IT IS HEREBY ORDERED THAT:

1. Non-expert discovery will be completed on or before July 5, 2006.
2. Expert disclosures are due on or before July 14, 2006. No reports shall be exchanged and filed at the time at the time of disclosure and/or supplemental disclosure.
3. Supplemental expert disclosures are due on or before July 24, 2006.
4. Expert witness discovery will be completed on or before August 15, 2006.

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STIPULATION TO EXTEND DEADLINES

4. Expert witness discovery will be completed on or before August 15, 2006.

5. Dispositive hearing motions will be filed no later than July 15, 2006.

6. All other dates shall remain unchanged, Further Status Conference, June 30, 2006, Pre-trial Conference, September 14, 2006, and Trial, September 25, 2006.

At this time, the parties do not anticipate requesting any other changes to the Pretrial Preparation Order. The parties further agree that counter-part facsimile renditions of signatures are sufficient for entry of this stipulation into the court files.

IT IS SO STIPULATED.

Dated: May 16, 2006

LAW OFFICES OF JEAN SCHAEFER

By: Jean Schaefer
Jean Schaefer
Attorney for Defendant/Counterclaimant

Dated: May 22, 2006

UNION PACIFIC RAILROAD COMPANY

By: Michael L. Whitcomb
Michael L. Whitcomb
John D. Feeney
Attorneys for Defendant/Counterdefendant

Dated: May ____, 2006

GANONG & WYATT

By: Phillip W. Ganong
Phillip W. Ganong
Ralph Wm. Wyatt
Attorneys for Plaintiff/Counterdefendant

ORDER

After considering the Stipulation by and between the parties, through their counsel of record,

IT IS HEREBY ORDERED THAT:

1. Non-expert discovery will be completed on or before July 5, 2006.

2. Expert disclosures are due on or before July 14, 2006. No reports shall be exchanged and filed at the time at the time of disclosure and/or supplemental disclosure.

3. Supplemental expert disclosures are due on or before July 24, 2006.

4. Expert witness discovery will be completed on or before August 15, 2006.

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CERTIFICATE OF SERVICE
(28 U.S.C. § 1746, F.R.C.P. 5(b))

Case Name: **Glow v. Union Pacific, et al.**

Case Number: C 05 01933 MMC

Jurisdiction: United States District Court, Northern District, CA

I, Raymond A. Mills, declare:

I am, and was, at the time of the service referred to herein, a resident of, and employed in the County of Sacramento, State of California. I am over the age of 18 and not a party to the cause within. My business address is 1337 Howe Avenue, Suite 106, Sacramento, California 95825.

On 5-16-06, the date shown below, I caused to be served the following document:

STIPULATION MODIFYING PRETRIAL PREPARATION ORDER; ORDER THEREON

on all parties in this action by placing a true and correct copy enclosed in a sealed envelope addressed as follows:

Michael L. Whitcomb, Esq. John D. Feeney, Esq. UNION PACIFIC RAILROAD COMPANY Law Department 49 Stevenson Street, Suite 1050 San Francisco, CA 94105 Facsimile No. (916) 789-6227 ✓	Phillip W. Ganong Ralph Wm. Wyatt GANONG & WYATT, LLP 924 Truxten Avenue Bakersfield, CA 93301 Facsimile No. (661) 327-3395 ✓

☒ (BY MAIL) on May 16, 2006, at Sacramento, California, pursuant to Code of Civil Procedure Section 1013(a), by placing ☐ the original, or ☒ a true and correct copy thereof, enclosed in a sealed envelope with postage thereon fully prepaid, on deposit with the United States Postal Service on that same day. I am readily familiar with this firm's practice of collection and processing of documents for mailing, and with the requirements of Section 1013(a).


☐ (BY PERSONAL SERVICE) I caused to be delivered such envelope by hand to the office(s) of the addressee(s).

☐ (BY OVERNIGHT EXPRESS)

☒ (BY FACSIMILE AND/OR BY E-MAIL)

I declare, under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that I am employed in the office of a member of the bar of this Court, at whose direction this service was made.

DATED: 5-16-06


Raymond Mills

CERTIFICATE OF SERVICE
(28 U.S.C. § 1746, F.R.C.P. 5(b))

Case Name: **Glow v. Union Pacific, et al.**
Case Number: C 05 01933 MMC
Jurisdiction: United States District Court, Northern District, CA

I, Ellamay Hamilton, declare:

I am, and was, at the time of the service referred to herein, a resident of, and employed in the County of Sacramento, State of California. I am over the age of 18 and not a party to the cause within. My business address is 1337 Howe Avenue, Suite 106, Sacramento, California 95825.

On 6-1-06, the date shown below, I caused to be served the following document:

STIPULATION MODIFYING PRETRIAL PREPARATION ORDER; ORDER THEREON

on all parties in this action by placing a true and correct copy enclosed in a sealed envelope addressed as follows:

Michael L. Whitcomb, Esq. John D. Feeney, Esq. UNION PACIFIC RAILROAD COMPANY Law Department 10031 Foothills Boulevard, #200 Roseville, CA 95747	Phillip W. Ganong Ralph Wm. Wyatt GANONG & WYATT, LLP 924 Truxten Avenue Bakersfield, CA 93301

☒ (BY MAIL) on 6-1-06, at Sacramento, California, pursuant to 28 U.S.C. § 1746, F.R.C.P. 5(b) and Code of Civil Procedure Section 1013(a), by placing ☐ the original, or ☒ a true and correct copy thereof, enclosed in a sealed envelope with postage thereon fully prepaid, on deposit with the United States Postal Service on that same day. I am readily familiar with this firm's practice of collection and processing of documents for mailing, and with the requirements of such Sections.

☐ (BY PERSONAL SERVICE) I caused to be delivered such envelope by hand to the office(s) of the addressee(s).

☐ (BY OVERNIGHT EXPRESS)

☐ (BY FACSIMILE AND/OR BY E-MAIL)

I declare, under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that I am employed in the office of a member of the bar of this Court, at whose direction this service was made.

DATED: June 1, 2006

Ellamay Hamilton
Ellamay Hamilton